

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GLEND A JOHNSON, ET AL,

Plaintiffs,

v.

SMITHKLINE BEECHAM CORPORATION,
ET AL.,

Defendants.

Case No. 2:11-cv-05782-PD and all related
cases

**VERIFIED SUPPLEMENTAL STATEMENT OF TYLER WEAVER REGARDING
RESPONSE TO REPORT AND RECOMMENDATIONS OF THE
SPECIAL DISCOVERY MASTER**

Mr. Weaver hereby submits this supplemental statement regarding his response to the Report and Recommendations of the Special Discovery Master.

In his response to the Report and Recommendations, Mr. Weaver discussed what he and Hagens Berman knew about Ms. Bolton's case in August 2014 and why they took the positions they took. Mr. Weaver did so only to respond to the Special Master's suggestion that Mr. Weaver and/or Hagens Berman treated Ms. Bolton's case differently in 2014 than they did those of other plaintiffs. In doing so, Mr. Weaver was not commenting on or suggesting how the Court should treat Ms. Bolton's claim on the merits. Mr. Weaver can only speak as to what he knew in 2014, and that is what he has testified to and discussed in his response to the Report and Recommendations.

Mr. Weaver is aware, as he testified in May 2019, that Dr. Stephens issued a report in 2018 in which Dr. Stephens calculated the statistical probabilities of Ms. Bolton's injuries appearing in a single person, which was different than what he did in 2014. 5/8/2019 Tr. at 345:22-346:6. That 2018 report could be used to support an argument that thalidomide caused Ms. Bolton's injuries. In his response to the Special Master's report and recommendations, Mr. Weaver is not

commenting on that different 2018 report, nor is he commenting on, nor could he comment on, the merits of Ms. Bolton's case as she may present it at some time in the future, including whether the 2018 report and / or other evidence addresses or negates issues raised by her 1964 birthdate.

Respectfully submitted,

Date: January 29, 2024

/s/ Robert E. Welsh, Jr.

Robert E. Welsh, Jr.

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Counsel for Tyler Weaver

VERIFIED:

A handwritten signature in dark ink, appearing to read 'Tyler Weaver', is written over a horizontal line.

Tyler Weaver